

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION

UNITED STATES OF AMERICA

PLAINTIFF

v.

CIVIL ACTION NO. 2:23-cv-63-TBM-RPM

ALL FUNDS HELD IN BANK FIRST  
ACCOUNT NUMBER 18088591, HELD  
IN THE NAME OF GREAT CONCEPTS,  
INC.

DEFENDANT PROPERTY

**VERIFIED COMPLAINT FOR FORFEITURE *IN REM***

The United States of America, by and through its United States Attorney and the undersigned Assistant U.S. Attorney for the Southern District of Mississippi, brings this Verified Complaint for Forfeiture *in rem*, in accordance with Rule G(2) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions (“the Supplemental Rules”) and the Federal Rules of Civil Procedure, and alleges as follows:

**NATURE OF THE ACTION**

1. This is an action by the United States seeking forfeiture of personal property—listed below (the “Defendant Property”)—which was involved in or constitutes the proceeds of a fraud scheme perpetrated by John Gregory Disotell. The Defendant Property is subject to forfeiture under 18 U.S.C. §§ 981(a)(1)(A), (C), and (D), on the grounds that it represents property which constitutes or is derived, directly or indirectly, from proceeds traceable to 18 U.S.C. §§ 1343 (wire fraud), 1344 (bank fraud), and/or was involved in violations of 1956(a)(1)(B)(i) and/or 1957 (money laundering).

**THE DEFENDANT *IN REM***

2. The Defendant Property consists of the following asset:

| Asset ID | Property Description  |
|----------|---|
| TBD      | All funds <sup>1</sup> held in Bank First Account Number 18088591, held in the name of Great Concepts, Inc., with authorized signatory John Gregory Disotell. |

**JURISDICTION AND VENUE**

3. This Court has jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345, and over an action for forfeiture *in rem* under 28 U.S.C. § 1355.

4. Venue is proper in the Northern Division of the Southern District of Mississippi pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395(a) and (b), because at least some of the acts and/or omissions giving rise to the forfeiture occurred in this district and/or pursuant to 28 U.S.C. § 1395(b), because the Defendant Property is maintained in a bank account in this District.

**BASIS FOR FORFEITURE**

5. The Defendant Property is subject to forfeiture under 18 U.S.C. §§ 981(a)(1)(A), (C), and (D), on the grounds that they represent property which constitutes or is derived, directly or indirectly, from proceeds traceable to 18 U.S.C. §§ 1343 (wire fraud), 1344 (bank fraud), and/or represents proceeds and/or was involved in violations of 1956(a)(1)(B)(i) and/or 1957 (money laundering).

6. Section 981(a)(1)(D) of Title 18, United States Code, makes subject to forfeiture “[a]ny property, real or personal, which represents or is traceable to the gross receipts obtained,

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<sup>1</sup> As of April 11, 2023, this account held \$273,398.60. The current amount in the account is unknown, but it holds, at a minimum, the \$250,000.00 deposited in the form of a cashier’s check.

directly or indirectly, from a violation of ... (vi) section 1343 (relating to wire fraud), if such violation relates to the sale of assets acquired or held by the Federal Deposit Insurance Corporation, as conservator or receiver for a financial institution, or any other conservator for a financial institution appointed by the Office of the Comptroller of the Currency or the National Credit Union Administration, as conservator or liquidating agent for a financial institution.”

7. Section 981(a)(1)(C) of Title 18, United States Code, makes subject to forfeiture “[a]ny property ... which constitute or is derived from proceeds to a violation of section ... 1344 [bank fraud] of this title or any offense constituting “specified unlawful activity” (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.” Pursuant to 18 U.S.C. §§ 1956(c)(7) and 1961(1)(B), wire fraud is a specified unlawful activity.

8. Section 981(a)(1)(A) of Title 18, United States Code, makes subject to forfeiture “[a]ny property ... involved in a transaction ... in violation of section 1956, 1957, or 1960 of this title, or any property traceable to such property.”

### **FACTS AND CIRCUMSTANCES**

9. A detailed account of the facts and circumstances supporting the seizure and forfeiture of the Defendant Property is set out in United States Secret Service Special Agent Martez Simpson’s declaration, attached hereto as Exhibit “A” and incorporated herein by reference.

### **FIRST CLAIM FOR RELIEF**

#### **(18 U.S.C. § 981(a)(1)(D))**

10. Paragraphs 1 through 9 above are incorporated by reference as if fully set forth herein.

11. The Defendant Property constitutes real or personal property which represents or is traceable to the gross receipts obtained, directly or indirectly, from a violation of 18 U.S.C. § 1343 (wire fraud). These violations related to fraudulently obtained loans obtained through a financial institution and funds deposited into a Wells Fargo and, subsequently, Bank First account. The Defendant Property is therefore forfeitable to the United States of America under 18 U.S.C. § 981(a)(1)(D).

**SECOND CLAIM FOR RELIEF**  
**(18 U.S.C. § 981(a)(1)(C))**

12. Paragraphs 1 through 11 above are incorporated by reference as if fully set forth herein.

13. The Defendant Property constitutes property traceable, constituting, or derived from proceeds traceable to violations of 18 U.S.C. §§ 1343 (wire fraud), 1344 (bank fraud), and 1956(a)(1)(B)(i) and/or 1957 (money laundering), and is therefore forfeitable to the United States of America under 18 U.S.C. § 981(a)(1)(C).

**THIRD CLAIM FOR RELIEF**  
**(18 U.S.C. § 981(a)(1)(A))**

14. Paragraphs 1 through 11 above are incorporated by reference as if fully set forth herein.

14. The Defendant Property constitutes property involved, or traceable to property involved in, a transaction in violation of 18 U.S.C. § 1956(a)(1)(B)(i) and/or 18 U.S.C. § 1957 (money laundering).

WHEREFORE, the United States prays

- a. that the Defendant Property be forfeited to the United States,
- b. that due process issue for seizure and forfeiture of the Defendant Property,

- c. that this Court issue a warrant for the arrest of the Defendant Property,
- d. that all persons having an interest therein be cited to appear herein and show cause why forfeiture should not be decreed,
- e. that notice of this action be given to all persons known or thought to have an interest in or right against the property,
- f. that a judgment be entered declaring that the Defendant Property be condemned as forfeited to the United States for disposition in accordance with law,
- g. that the United States be awarded its costs and disbursements in this action, and
- h. for such other and further relief as the Court deems just and proper.

**RESPECTFULLY SUBMITTED**, this the 27th day of April 2023,

UNITED STATES OF AMERICA

DARREN J. LAMARCA  
United States Attorney

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**VERIFICATION**

I, Martez Simpson, hereby verify and declare under penalty of perjury that I am a Special Agent with the United States Secret Service ("USSS"), that I have read the foregoing Verified Complaint for Forfeiture *in rem* and know the contents thereof, and that the matters contained in the Verified Complaint for Forfeiture *in rem* are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States of America, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as an USSS Special Agent.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Dated this the 27th day of April 2023.

  
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MARTEZ SIMPSON  
Special Agent  
United States Secret Service